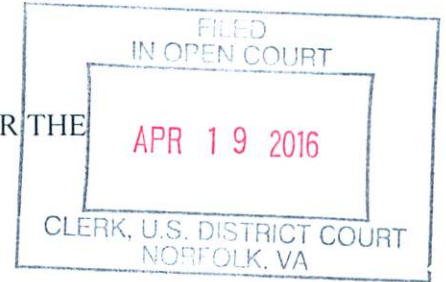


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Norfolk Division



UNITED STATES OF AMERICA                     )  
   )  
   )     CRIMINAL NO. 2:16cr25  
   )  
v.   )  
   )  
NETISHA GEORGE,                                 )  
   )  
   )  
   )     Defendant.

STATEMENT OF FACTS

If this matter had gone to trial, the United States would have proven Counts Two and Forty of the criminal indictment beyond a reasonable doubt, by proof of the following facts:

Beginning in at least 2012 and continuing through 2015, the defendant, NETISHA GEORGE, along with Maurice Evans concocted a scheme by way they could defraud the Internal Revenue Service (IRS), a department or agency of the United States. Specifically, GEORGE and Evans used the identities and personally identifying information of other individuals to file false and fraudulent income tax returns and fraudulently obtain income tax refunds.

The scheme was discovered in 2014 when evidence was obtained by the Virginia Beach Sherriff's Office implicating GEORGE and Evans. During much of the relevant time of the indictment, Evans was incarcerated in a Virginia Beach jail. Utilizing the jail phone system and the United States mail, GEORGE and Evans communicated about the scheme, including sharing with each other the names, social security numbers, and other identifying information of individuals they used to file false and fraudulent income tax returns. The scheme was discovered when some of this information was discovered in Evans's jail cell. Specifically, GEORGE mailed Evans a list of names, social security numbers, birthdates, addresses, and debit

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card information entitled "Guest List." All of the names on this list were used by GEORGE and Evans to file false and fraudulent income tax returns and obtain income tax refunds. GEORGE utilized the United States Mail to send this list to Evans while in jail because he did not trust her and he wanted to verify that she was filing the returns as she was supposed to be doing.

GEORGE and Evans would often obtain the identifying information by convincing individuals to provide their personally identifying information to use in the filing of false income tax returns. GEORGE and Evans used the data to file false income tax returns and obtain tax refunds. The returns in question were filed electronically using the internet. GEORGE filed the returns, often times using the internet service at the various locations where she was employed. Information on the income tax returns, such as employer, income, and address were all false and used to maximize the amount of the refund and ensure it would be directed towards an address that GEORGE and Evans could access.

GEORGE and Evans obtained the personally identifying information of A.S and GEORGE filed three false and fraudulent tax returns in his name for tax years 2012, 2013, and 2014. Specifically, the 2012 false and fraudulent tax return indicated that A.S. worked for International Construction, earned approximately \$10,000 in wages and resided at an address on West 36<sup>th</sup> Street in Norfolk, Virginia. In reality, A.S. never filed a 2012 tax return nor did he give GEORGE or Evans permission to file the return that was filed on his behalf. Additionally, A.S. never worked at International Construction, did not earn approximately \$10,000 in wages, and never lived at the address on West 36<sup>th</sup> Street in Norfolk. A.S. knew Evans as "FATS" and GEORGE as FATS's girlfriend. According to A.S., he knew FATS's girlfriend (GEORGE) did taxes and he provided them his personal information so she could see about doing his taxes

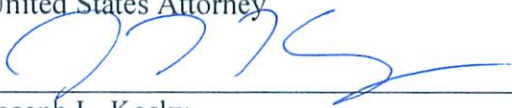
because he trusted them. When A.S. never heard back from the pair, he inquired with Evans as to whether they filed his tax return. Evans told A.S. they did not file a return for him. In reality, on February 28, 2013, GEORGE had filed a false and fraudulent income tax return in the name of A.S. claiming a tax refund in the amount of \$2,054. The information such as wages, employment, and address were all false and concocted by GEORGE and Evans.

In total, GEORGE and Evans filed at least 76 false and fraudulent income tax returns totaling \$235,922. Based upon these filings, they successfully obtained income tax refunds in the amount of \$147,420.92.

Respectfully submitted,

Dana J. Boente  
United States Attorney

By:



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After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, NETISHA GEORGE and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

  
NETISHA GEORGE  
Defendant

I am Andrew Grindrod, Netisha George's attorney. I have carefully reviewed the above Statement of Facts with her. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.

  
Andrew Grindrod  
Attorney for NETISHA GEORGE